

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Richard W. Slack

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,	: Case No. 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
	:
	:
-----X	

**DEBTORS' DESIGNATION OF ADDITIONAL ITEMS FOR RECORD ON
APPEAL FROM THE ALTERNATIVE DISPUTE RESOLUTION
PROCEDURES ORDER FOR AFFIRMATIVE CLAIMS OF
THE DEBTORS UNDER DERIVATIVES TRANSACTIONS
WITH SPECIAL PURPOSE VEHICLE COUNTERPARTIES**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure,
appellee Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced
chapter 11 cases, as debtors and debtors in possession (together, the "Debtors"), hereby
submit the following designation of additional items to be included in the record for the
appeal filed by Ka Kin Wong, Siu Lui Ching, Tim Choy Fung, Lin Tei Tse, Sau King
Tse, Lai Kuen Chan, Fuk Shing Wong, Siu Kwan Wong, Yee Ming Shen, and Yuen Fun
Tang ("Plaintiffs") from the Alternative Dispute Resolution Procedures Order for
Affirmative Claims of the Debtors Under Derivative Transactions with Special Purpose

Vehicle Counterparties entered in the above-referenced chapter 11 cases on March 3, 2011 [Docket No. 14789] by the United States Bankruptcy Court for the Southern District of New York.

Counter-Designation of the Record on Appeal

In addition to the items designated by Plaintiffs to be included in the record on appeal, the Debtors designate the following:

1. Alternative Dispute Resolution Procedures Order for Affirmative Claims of Debtors Under Derivatives Contracts, entered on September 17, 2009 [Docket No. 5207];
2. Notice of Withdrawal of Credit Agricole Corporate and Investment Bank's Objection to Debtors' Motion Pursuant to Section 105(a) of the Bankruptcy Code and General Order M-390 for Authorization to Implement Alternative Dispute Resolution Procedures for Affirmative Claims of Debtors Under Derivatives Transactions With Special Purpose Vehicle Counterparties, filed on January 10, 2011 [Docket No. 13859]; and
3. Notice of Withdrawal of Limited Objection of Aviva S.p.A., Aviva Italia Holding S.p.A., Aviva Vita S.p.A., Aviva Life S.p.A., Aviva Italia S.p.A., Aviva Assicurazioni S.p.A., and Aviva Previdenza S.p.A. to Debtors' Motion Pursuant to Section 105(a) of the Bankruptcy Code and General Order M-390 for Authorization to Implement Alternative Dispute Resolution Procedures for Affirmative Claims of Debtors Under Derivatives Transactions With Special Purpose Vehicle Counterparties, filed on January 10, 2011 [Docket No. 13870].

Dated: April 14, 2011
New York, New York

Respectfully submitted,

/s/ Richard W. Slack
Richard W. Slack
WEIL GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession